

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

WAYLON BAILEY,

Plaintiff,

v.

RANDELL ILES, in his individual capacity; and
SHERIFF MARK WOOD, in his official
capacity as a public entity;

Defendants.

CIVIL ACTION NO. 1:20-cv-01211

JUDGE DAVID C. JOSEPH

MAG. JUDGE PEREZ-MONTES

PLAINTIFF’S PROPOSED VOIR DIRE QUESTIONS

Plaintiff submits the following proposed *voir dire* questions:

1. Does anyone here work for a police department, Sheriff’s Office, correctional facility, or other law enforcement agency?
2. Is anyone here friends or family with defendant Randell Iles or Sheriff Mark Woods?
3. Is anyone here friends or family with plaintiff Waylon Bailey?
4. Has anyone here heard of plaintiff Waylon Bailey?
5. Has anyone here been the victim of terrorism?
6. Has anyone here ever been arrested for a crime they did not commit?
7. Have you or anyone in your family worked for a police department, Sheriff’s Office, correctional facility, or other law enforcement agency?
8. If the Court said that the standard for the plaintiff to prevail in this case is a preponderance of the evidence—that is, the evidence is more 50% in favor of the plaintiff—who would want to see more than that to find for the plaintiff?

9. If selected, who, regardless of the instructions, would say to themselves ‘I need to be at least 75% convinced before I can vote for the plaintiff?’ How about 100%?
10. Have you or anyone in your family or close friends worked as a risk manager or for an insurance company?
11. Have you or anyone in your family or close friends worked for a law firm? What firm and in what capacity?
12. Does anyone here believe that it is wrong to evaluate whether a police officer or Sheriff deputy violated an individual’s rights?
13. Who believes that governmental overreach is a major concern in America today?
14. Who believes that the Bill of Rights is under attack in America today?
15. Who believes that law enforcement officers are unreasonably criticized in America today?
16. Who thinks that law enforcement should be given the “benefit of the doubt” when it comes to their arrest of people who have been suspected of committing a crime?
17. Would anyone here only award damages to an individual who was arrested by a Sheriff deputy if they were 100% convinced that the Sheriff deputy was in the wrong?
18. Who here thinks that, in a civil case, a plaintiff should be required to produce overwhelming evidence to obtain a verdict against a Sheriff’s Office?
19. Who at this point automatically feels sympathy for the defendant because they have been sued by the plaintiff?
20. Has anyone here ever had to defend themselves in a civil lawsuit?
21. Does anyone here think that filing a lawsuit is a bad thing?
22. Is anyone here a follower of QANON?

23. Does anyone here have a negative opinion of someone who brings a lawsuit to deal with an injury or a violation of their rights?
24. Would anyone here refuse to award damages to the plaintiff because he is suing a Sheriff deputy and a Sheriff Mark Woods?
25. Do you have any bumper stickers on your vehicle and if so, what do they say?